

STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
RAYMOND P. MACCAUSLAND,	)	
Individually and on Behalf of all Persons	)	
Similarly Situated,	)	
<i>Plaintiff,</i>	)	
	)	NMG Civil Action No. 1:17-cv-10253
v.	)	
	)	
UBER TECHNOLOGIES, INC.	)	
and RASIER, LLC,	)	
<i>Defendants.</i>	)	
_____	)	

**LINDSEY O’LEARY AND JENNI-LEIGH O’LEARY’S MOTION TO SUBSTITUTE  
PARTIES PURSUANT TO FED. R. CIV. P. 25 AND MOTION TO AMEND THE  
COMPLAINT PURSUANT TO RULE 15**

Lindsey O’Leary and Jenni-Leigh O’Leary (hereafter the “MacCausland Daughters”), the successors, heirs, and Administrators of the Estate of Raymond P. MacCausland, Jr., move pursuant to Fed. R. Civ. P. 25 to substitute Lindsey O’Leary and Jenni-Leigh O’Leary, Administrators of the Estate of Raymond P. MacCausland, Jr., as the Plaintiff in this matter.

The MacCausland Daughters further seek pursuant to Fed. R. Civ. P. 15 to amend the Second Amended Complaint to (1) remove reference to taxi medallion owners and taxi medallions, (2) correct the quoted language in paragraph 53 to properly reflect City of Boston Ordinance 16-15.05, (3) remove the antitrust prayers of relief, and (4) correct typographical errors.

A proposed Third Amended Complaint reflecting the substitution and the above changes is submitted herewith as Exhibit 1.

The MacCausland Daughters’s appointment as Administrators is attached hereto as Exhibit 2.

Pursuant to Local Rule 7.1(b)(1), the MacCausland Daughters submit herewith a memorandum of law in support of his motion.

**WHEREFORE**, the MacCausland Daughters request that this Honorable Court substitute Lindsey O’Leary and Jenni-Leigh O’Leary, Administrators of the Estate of Raymond P. MacCausland, Jr., as the Plaintiff in this matter and permit them to amend the Complaint as described above.

Respectfully submitted, the Plaintiff,  
Lindsey O’Leary and Jenni-Leigh O’Leary,  
Administrators of the Estate of Raymond P.  
MacCausland, Jr.,  
By their Attorneys,

**COLUCCI, COLUCCI, MARCUS & FLAVIN, P.C.**

/s/ Brendan R. Pitts

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Dated: 4/11/19

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), counsel for the Plaintiff has conferred with counsel for Defendant Uber Technologies, Inc., and have attempted in good faith to resolve or narrow the issues raised by this motion.

/s/ Brendan R. Pitts

Dated: 4/11/19

**CERTIFICATE OF SERVICE**

I, hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Brendan R. Pitts

Dated: 4/11/19